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FILED IN UNITED STATES DISTRICT
COURT, DISTRICT OF UTAH
NOV 17 2011
BY D. MARK JONES, CLERK
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	Case No.	2 : 11mj 292 BCW
Plaintiff,	:		
	:	FELONY COMPLAINT	
v.	:		
JOSHUA RAYMOND TOWNSEND,	:	VIO. 18 U.S.C. § 844(i), Arson Damaging	
	:	Property in Interstate Commerce	
Defendant.	:		

Before Brooke C. Wells, United States Magistrate Judge for the District of Utah,
appeared the undersigned, who on oath deposes and says:

COUNT I

On or about November 17, 2011, in the Central Division of the District of Utah,

JOSHUA RAYMOND TOWNSEND,

the defendant herein, did maliciously damage and destroy, and attempt to damage and destroy, by
means of fire, a building and other real and personal property used in interstate and foreign

commerce, including the building and contents of the Wells Fargo Bank at 2640 West 9000 South, West Jordan, Utah; all in violation of Title 18, Section 844(i) of the United States Code.

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Cameron M. Smilie, ("Your affiant"), a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Salt Lake City Division, being duly sworn, depose and state as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation, presently assigned to the Salt Lake City Field Office, Joint Terrorism Task Force, (JTTF), Salt Lake City, Utah.

FACTS AND CIRCUMSTANCES

2. Approximately two months prior to November 17, 2011, Joshua Raymond TOWNSEND ordered five pounds of a pre-manufactured mixture of chemicals to create a explosive incendiary device. TOWNSEND purchased these chemicals with the intention to blow up a bank.

3. On November 16, 2011 TOWNSEND decided that he would act on his plan of attacking a bank, specifically an automated teller machine. Instead of using his ordered chemicals, he purchased a can of gas from the Smith's Grocery Store at 9000 South 4000 West, West Jordan, Utah for the purpose of making Molotov cocktails to use in his attack on a bank. TOWNSEND did not purchase gas for his vehicle and paid with cash. The purchase of gas was for the sole purpose of the Molotov cocktail.

4. In the early morning hours of November 17, 2011, TOWNSEND went to Wells Fargo Bank at 2640 West 9000 South, West Jordan, Utah. TOWNSEND sat in his car for approximately an hour and a half, deciding whether to go forward with his plan. At 4:30 a.m., TOWNSEND called 911 and told the operator that he was going to throw a Molotov cocktail at a Wells Fargo bank and provided the dispatcher with the address of the bank.

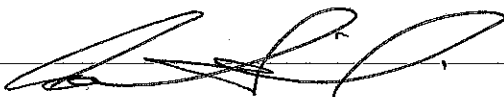
5. TOWNSEND exited the vehicle, lit a Molotov cocktail and threw it at the bank building, but it failed to ignite upon hitting the bank. He had not prepared more than one cocktail, so he returned to the vehicle and prepared another. He lit the second cocktail and threw it at the west side of the bank, breaking a window and lighting a bush on fire located on the west side of the bank building. Thinking that the inflamed bush would cause the entire building to burn, TOWNSEND attempted to accelerate the fire by adding more gasoline. After placing more gasoline on the fire, however, it rapidly extinguished itself. TOWNSEND then started to return to the car in attempt to retrieve the chemical mixture he had previously ordered. While going to his vehicle TOWNSEND saw responding law enforcement and decided to give up. He sat on the hood of his car and complied with all orders from law enforcement. The bank building sustained damage as a result of TOWNSEND's actions.

6. After being advised of his Miranda rights and waiving these rights TOWNSEND was transported to West Jordan Police Department. There, after waiving his rights again at 7:48 a.m., TOWNSEND admitted to purchasing, storing and manufacturing all of the materials used in this incident. TOWNSEND also admitted to committing the act of attempting to destroy an automated teller machine at the Wells Fargo Bank at 2640 West 9000 South, West Jordan, Utah. TOWNSEND voluntarily furnished all details pertaining to attack of the Wells Fargo Bank on

the morning of November 17, 2011, which have been summarized in this affidavit.

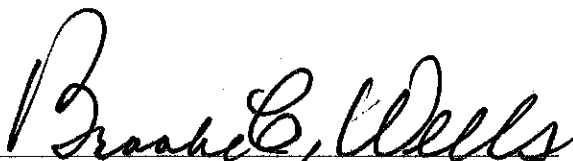
CONCLUSION

This affidavit is based upon my own investigation, and the investigation other officers and agents who responded to the incident, representing the West Jordan Police Department, ATF, FBI and JTTF. Based upon the foregoing, your affiant believes there is probable cause to believe that TOWNSEND violated Title 18 U.S.C. § 844(i), Arson Damaging Property in Interstate Commerce.



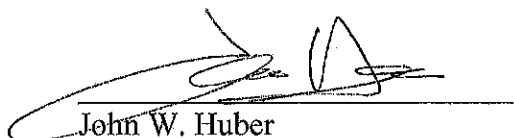
Cameron M. Smilie
Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me this 16 day of November, 2011.



Brooke C. Wells
UNITED STATES MAGISTRATE JUDGE

Approved:



John W. Huber
Assistant United States Attorney